

Our File No.: 53918  
MORTON & CRAIG, LLC  
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Attorney for Santander Consumer USA Inc.  
JM5630\_\_\_\_\_

IN RE  
ROBERT FRANK HUNTER, JR.

UNITED STATES  
BANKRUPTCY COURT FOR  
THE DISTRICT OF NEW  
JERSEY

CHAPTER 13  
CASE NO: 22-19586 (VFP)  
HEARING DATE: 7-20-2023

NOTICE OF MOTION OF  
SANTANDER CONSUMER  
USA INC. TO MODIFY THE  
AUTOMATIC STAY

To:

Robert Frank Hunter, Jr.  
112 Forest Avenue  
West Caldwell, NJ 07006  
Debtor

Christopher G. Cassie, Esq.  
1000 Maplewood Drive  
Suite 202  
Maple Shade, NJ 08052  
Attorney for the debtor

Marie-Ann Greenberg  
30 Two Bridges Road  
Suite 330  
Fairfield, NJ 07004-1550  
Trustee

U.S. Trustee, US Dept of Justice  
Office of the US Trustee  
One Newark Center, Suite 2100  
Newark, NJ 07102

William E. Craig, Esquire, attorney for Santander Consumer USA Inc., has filed papers with the Court for relief from the automatic stay to permit Santander Consumer USA Inc. to repossess and sell the motor vehicle(s) described in the attached pleadings. **Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult with one.** If you do not want the Court to grant the relief sought, or if you want the Court to consider your views on the motion, then no later than seven (7) days before the hearing date, you or your attorney must:

File with the Court a written request for a hearing (or, if the Court requires a written response, an answer, explaining your position) at:

United States Bankruptcy Court  
50 Walnut Street  
PO Box 1352  
Newark, NJ 07101-1352

If you mail your (request) (response) to the Court for filing, you must mail it early enough so the Court will receive it on or before the date stated above.

You must also mail a copy to:

William E. Craig, Esquire  
110 Marter Avenue, Suite 301  
Moorestown, NJ 08057

TAKE FURTHER NOTICE that the facts movant relies upon, as set forth on the accompanying certification, and the basis for relief from the automatic stay, do not present complicated questions of fact or unique questions of law, it is hereby submitted that no brief is necessary in the Court's consideration of the within Motion, and TAKE FURTHER NOTICE that oral argument is hereby not requested.

**Attend the hearing scheduled to be held on July 20, 2023 at 10 a.m. in Courtroom #3B, United States Bankruptcy Court, 50 Walnut Street, Newark, New Jersey 07102.**

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion and may enter an order.

Date: 6-29-2023

/s/ William E Craig, Esquire  
William E. Craig, Esquire  
Attorney for Santander Consumer USA Inc.